

LAW OFFICE OF DANIEL MARKS
DANIEL MARKS, ESQ.
Nevada State Bar No. 002003
office@danielmarks.net
ADAM LEVINE, ESQ.
Nevada State Bar No. 004673
alevine@danielmarks.net
610 South Ninth Street
Las Vegas, Nevada 89101
(702) 386-0536; FAX (702) 386-6812
Email: office@danielmarks.net
Attorneys for Counter-Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CLARK COUNTY EDUCATION
ASSOCIATION,

Plaintiff,

v.

ALEXANDER ROCHE, an individual;

Defendant.

ALEXANDER ROCHE, an individual;

Counter Claimant

v.

CLARK COUNTY EDUCATION;
ASSOCIATION, a labor union and employer;
CLARK COUNTY STAFF ORGANIZATION, a
labor union; DOE BUSINESS ENTITIES 1-10;
JOHN VELLARDITA, Executive Director of
CCEA, an individual, in his individual and official
capacities,

Counter Defendants.

Case No.: 2:22-cv-00964-GMN-DJA

**STIPULATION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING TO
DEFENDANT/COUNTER-PLAINTIFF'S
ANSWER AND COUNTERCLAIM TO
PLAINTIFF'S AMENDED COMPLAINT**

**STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING TO
DEFENDANT/COUNTER-PLAINTIFF'S ANSWER AND COUNTERCLAIM TO
PLAINTIFF'S AMENDED COMPLAINT**

Plaintiff/Counter-Defendants CLARK COUNTY EDUCATION, ASSOCIATION ("CCEA"), CLARK COUNTY STAFF ORGANIZATION ("CCSO"), and JOHN VELLARDITA ("Vellardita") (Collectively referred to herein as "Counter-Defendants") by and through their attorneys of record, Adam Levine, Esq. and Daniel Marks, Esq. of the Law Office of Daniel Marks and Defendant/Counter-Plaintiff, ALEXANDER ROCHE ("Roche") by and through his counsel, ROBERT S. MELICIC, ESQ., hereby stipulate to an extension of time to file a responsive pleading to Defendant/Counter-Plaintiff's Answer and Counterclaim to Plaintiff's Amended Complaint.

CCEA filed its Amended Complaint, Jury Trial Demanded in the Clark County, Nevada Eighth District Court as Case No. A-21-838848-C (the "District Court Action") on January 14, 2022.

Defendant/Counter-Plaintiff Alexander Roche filed his Answer and Counterclaim to Plaintiff's Amended Complaint in the District Court Action on May 27, 2022.

Counter-Defendants filed their Notice of Appearance in the District Court Action on June 14, 2022.

Counter-Defendants filed their Petition for Removal from the District Court (ECF #1) on June 17, 2022.

The parties have agreed to a sixty (60) day extension for Counter-Defendants to respond to Roche's Counterclaim. This request is not made

The parties have met and conferred and agree that neither side will suffer prejudice from this Stipulation for Extension of Time. This request is not made to delay the proceedings. Instead, the request is made to accommodate the occurrence of unexpected and significant competing professional obligations of Counter-Defendant's counsel. In addition, Counter-Defendant's counsel just finished a five (5) day trial and has had numerous arbitrations and administrative hearings, and he also has a

number of briefs and responses on extension that due to his recent bout with Covid19, are due at or about the time that the responsive pleading would otherwise be due.

Therefore, the parties respectfully request that Counter-Defendants' deadline to respond to the Counterclaim be extended sixty (60) days from June 13, 2022 to August 12, 2022.

DATED this 22nd day of June, 2022.

LAW OFFICE OF DANIEL MARKS

/s/Adam Levine, Esq.

ADAM LEVINE, ESQ.

Nevada State Bar No. 004673

610 South Ninth Street

Las Vegas, Nevada 89101

Email: office@danielmarks.net

Attorneys for Counter-Defendants

Clark County Education Association, Clark

County Staff Organization and John Vellardita

/s/Robert S. Melicic, Esq

ROBERT S. MELICIC, ESQ.

Nevada Bar No.: 14923

3315 E. Russell Road, Suite A4-271

Las Vegas, Nevada 89120

Tel: (702) 526-4235

Clerk: (702)725) 577-8013

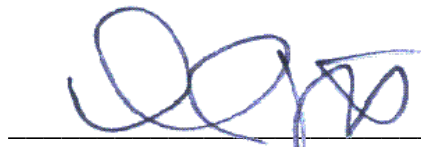
Email: robertmelcic@gmail.com

Attorney for Defendant/Counter-Plaintiff

Alexander Roche

IT IS SO ORDERED.

DATED: June 23, 2022



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

Joi Harper

From: Robert Melcic <robertmelcic@gmail.com>
Sent: Wednesday, June 22, 2022 2:54 PM
To: Joi Harper
Subject: Re: CCEA v. Roche and related cross-claim USDC Case No.: 2:22-cv-00964

You have my authority to sign.

Robert S. Melcic, Esq.
3315 E. Russell Road
Suite A4-271
Las Vegas, NV 89120
Telephone: (702) 526-4235
RobertMelcic@gmail.com

-Privileged and Confidential- The preceding email message (including any attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and may contain information that is confidential and/or legally privileged. Unauthorized distribution, reproduction, disclosure or use by an unintended recipient is prohibited and may be unlawful. If you received this communication in error, please notify the sender and then delete the message from your computer.

On Tue, Jun 21, 2022 at 5:10 PM Joi Harper <JHarper@danielmarks.net> wrote:

Good afternoon Counsel,

Attached is the proposed stipulation for Extension of Time to File Responsive Pleading to Defendant/Counter-Plaintiff's Answer and Counterclaim to Plaintiff's Amended Complaint for your review. Please let me know if you would like to make any changes and if not please either sign it or give me permission to esign it and return it to me at your earliest convenience.

Thank you,

Joi E. Harper, *Paralegal*

Law Office of Daniel Marks

610 South Ninth Street

Las Vegas, Nevada 89101

O: (702) 386-0536; F: (702) 386-6812

JHarper@danielmarks.net